

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

SHANE BURRIS, §
§
Plaintiff, §
§
v. § CIVIL ACTION NO. 4:23-cv-00057
§
TYSON FOODS, INC. AND, § JURY TRIAL DEMANDED
AMIR ATA JABARZADEH §
§
Defendants. §

INFORMATION PURSUANT TO LOCAL RULE CV-81(c)

(1) A list of all parties in the case, their party type (e.g., plaintiff, defendant, intervenor, receiver, etc.) and current status of the removed case (e.g., pending, dismissed);

Shane Burris
Plaintiff

Tyson Foods, Inc. and Amir Ata Jabarzadeh
Defendants

The removed case is currently pending.

(2) A civil cover sheet and a certified copy of the state court docket sheet; a copy of all pleadings that assert causes of action (e.g. complaints, amended complaints, supplemental complaints, counterclaims, cross-actions, third party actions, interventions, etc.); all answers to such pleadings and a copy of all process and orders served upon the party removing the case to this court, as required by 28 U.S.C. § 1446(a);

See attached civil cover sheet and documents attached to Defendant Tyson Foods, Inc.'s Notice of Removal as ***Exhibit A***.

(3) A complete list of attorneys involved in the action being removed, including each attorney's bar number, address, telephone number and party or parties

represented by him/her;
Ramez F. Shamieh
Texas State Bar No. 24066683
Email: ramez@shamiehlaw.com;
Myles Lenz
Texas State Bar No. 24092685
Email: myles@shamiehlaw.com
SHAMIEH LAW, PLLC
1111 W. Mockingbird Lane, Suite 1160
Dallas, TX 75247
Telephone: (214) 389-7333
Facsimile: (214) 389-7335

Counsel for Plaintiff Shane Burris

Zach T. Mayer
Texas State Bar No. 24013118
Email: zmayer@mayerllp.com
J. Edward Johnson
State Bar No. 24070001
Email: ejohnson@mayerllp.com
G. Adrian Galvan
State Bar No. 24108601
Email: agalvan@mayerllp.com
MAYER LLP
750 N. St. Paul Street, Suite 700
Dallas, Texas 75201
Telephone: 214.379.6900
Facsimile: 214.379.6939

Counsel for Defendant Tyson Foods, Inc.

(4) A record of which parties have requested a trial by jury (this information is in addition to filing a separate jury demand pursuant to Local Rule CV-38(a)); and

Plaintiff Shane Burris

(5) The name and address of the court from which the case is being removed.

The 431st Judicial District Court of Denton County, Texas
1450 E. McKinney St., 4th Floor
Denton, TX 76209

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Shane Burris

(b) County of Residence of First Listed Plaintiff Grayson Co., TX
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Ramez F. Shamieh and Myles Lenz, Shamieh Law, PLLC, 1111 W. Mockingbird Lane, Suite 1160, Dallas, TX 75247, (214) 389-7333.

DEFENDANTS

Tyson Foods, Inc. and Amir Ata Jabarzadeh

County of Residence of First Listed Defendant Washington Co., AR

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Zachary T. Mayer, J. Edward Johnson, and G. Adrian Galvan, Mayer LLP, 750 N. St. Paul St., Ste 700, Dallas, TX 75201, (214) 379-6900

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability		<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage		<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 400 Other Personal Injury		<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 410 Other Fraud		<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 415 Amer. w/Disabilities - Employment		<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 445 Amer. w/Disabilities - Employment		<input type="checkbox"/> 850 Securities/Commodities/ Exchange
REAL PROPERTY		CIVIL RIGHTS	HABEAS CORPUS:	<input type="checkbox"/> 890 Other Statutory Actions
		<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 891 Agricultural Acts
		<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 893 Environmental Matters
		<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 530 General	<input type="checkbox"/> 895 Freedom of Information Act
		<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 896 Arbitration
		<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	OTHER:	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
		<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 950 Constitutionality of State Statutes
		<input type="checkbox"/> 448 Education	<input type="checkbox"/> 550 Civil Rights	
			<input type="checkbox"/> 555 Prison Condition	
			<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	
IMMIGRATION				
<input type="checkbox"/> 462 Naturalization Application				
<input type="checkbox"/> 465 Other Immigration Actions				
FEDERAL TAX SUITS				
<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)				
<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609				

V. ORIGIN

(Place an "X" in One Box Only)

<input type="checkbox"/> 1 Original Proceeding	<input checked="" type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify)	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. Sec. 1332, 1441 and 1446

VI. CAUSE OF ACTION

Brief description of cause:
Automobile Accident

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION
UNDER RULE 23, F.R.Cv.P.

DEMAND \$

1,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

01/23/2023

SIGNATURE OF ATTORNEY OF RECORD

Zach T. Mayer

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFF JUDGE MAG. JUDGE

CASE SUMMARY

CASE NO. 22-10862-431

Shane Burris v. Tyson Foods, Inc. and Amir Ata
Jabarzadeh§
§
§
§Location: 431st Judicial District Court
Judicial Officer: Johnson, James S.
Filed on: 12/22/2022

CASE INFORMATION

Case Type: Injury/Damages - Motor
Vehicle

Case Status: 12/22/2022 Active

Case Flags: Jury Fee Paid

DATE	CASE ASSIGNMENT
	Current Case Assignment Case Number 22-10862-431 Court 431st Judicial District Court Date Assigned 12/22/2022 Judicial Officer Johnson, James S.

PARTY INFORMATION

Lead Attorneys
Shamieh, Ramez F
Retained
 214-389-7335(F)
 214-389-7333(W)

Plaintiff **Burris, Shane**Defendant **Jabarzadeh, Amir Ata**

Tyson Foods, Inc.

DATE	EVENTS & ORDERS OF THE COURT
12/22/2022	Plaintiff's Original Petition
12/22/2022	Jury fee paid <i>(This entry only represents the payment of the jury fee - not a document filed with the clerk.)</i>
12/22/2022	Citation Tyson Foods, Inc. Served: 12/29/2022 Anticipated Server: Private Process Server Actual Server: Private Process Server Return Date/Time: 01/03/2023 Jabarzadeh, Amir Ata Unserved Anticipated Server: Private Process Server Env #71263241
12/27/2022	Record/Copy Request
01/03/2023	Service Returned <i>Citation to Tyson Foods, Inc</i> For: Defendant Tyson Foods, Inc.

DATE	FINANCIAL INFORMATION
	Plaintiff Burris, Shane Total Charges 376.00

CASE SUMMARY**CASE NO. 22-10862-431**

Total Payments and Credits		376.00
Balance Due as of 01/20/2023		0.00
12/22/2022 Charge	Plaintiff Burris, Shane	376.00
12/22/2022 TexFile Payment Receipt # 2022-37643	Plaintiff Burris, Shane	(239.00)
12/22/2022 Credit	Plaintiff Burris, Shane	(137.00)

22-10862-431
CAUSE NO. _____**SHANE BURRIS**§
§
§
§
§
§
§
§**IN THE DISTRICT COURT***Plaintiff,*

v.

JUDICIAL DISTRICT**TYSON FOODS, INC. and
AMIR ATA JABARZADEH***Defendants.***DENTON COUNTY, TEXAS****PLAINTIFF'S ORIGINAL PETITION**

Shane Burris files his Original Petition complaining of Defendants Tyson Foods, Inc. and Amir Ata Jabarzadeh (collectively as "Defendants") and respectfully shows the Court the following:

I.
DISCOVERY CONTROL PLAN

1. Pursuant to Rule 190 of the *Texas Rules of Civil Procedure*, Plaintiff affirmatively pleads that he seeks monetary relief over \$1,000,000.00. Plaintiff also requests that this case be placed into Level 3 Discovery Plan.

II.
PARTIES

2. Plaintiff Shane Burris is a resident of Grayson County, Texas.

3. Defendant Tyson Foods, Inc. ("Tyson Foods") is a foreign corporation headquartered in Arkansas and organized under the laws of Delaware. It can be served through its registered agent: CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.



4. Defendant Amir Ata Jabarzadeh ("Jabarzadeh") is an individual who resides in Johnson County, Kansas, and can be served with process at: 11448 Conser Street, Overland Park Kansas, 66210, or wherever he may be found.

III.
JURISDICTION AND VENUE

5. This Court maintains jurisdiction over Defendant Jabarzadeh because he committed the torts at issue in Texas.

6. This Court maintains jurisdiction over Defendant Tyson Foods because it transacts business in the State of Texas and committed the torts at issue in Texas.

7. Venue is proper in Denton County because all or a substantial part of the events giving rise to Plaintiff's claims occurred in Denton County, Texas. TEX. CIV. PRAC. & REM. CODE § 15.002(a)(2).

IV.
BACKGROUND FACTS

8. On February 3, 2021, Defendant Jabarzadeh crashed into Plaintiff's vehicle on I-35 in Denton County, Texas when he made an unsafe lane change. Plaintiff attempted to take evasive action, but was unable to avoid the crash. At the time of the collision, Defendant Jabarzadeh was operating an 18-wheeler tractor and trailer owned and/or controlled by Defendant Tyson Foods. Upon information and belief, Defendant Jabarzadeh was in the course and scope of his employment with Defendant Tyson Foods at the time of the crash.

9. Plaintiff suffered serious injuries and damages for which he now brings this lawsuit. Defendants both proximately caused Plaintiff's injuries, and Plaintiff did not cause or contribute to his injuries in any way.



V.
CAUSES OF ACTION

Negligence – Defendant Jabarzadeh

10. The collision referenced above, and the resulting injuries and damages were proximately caused by the negligent conduct of Defendant Jabarzadeh in one or more of the following aspects:

- a) In failing to properly exercise his duty of care that a reasonable person would to avoid harm to others in the same or similar circumstances;
- b) In failing to keep a proper lookout of which an ordinary, reasonable person would have maintained under the same or similar circumstances;
- c) In failing to safely control one's speed;
- d) In failing to timely apply the brakes of his vehicle in order to avoid the collision in question;
- e) In failing to take evasive actions to avoid the collision in question;
- f) In failing to maintain a safe distance between the vehicle he was operating and Plaintiff's vehicle;
- g) In failing to stay alert;
- h) In failing to maintain a single lane of traffic;
- i) In operating a cell phone while operating the vehicle;
- j) In making an unsafe turn/lane change; and
- k) In engaging in various other acts of negligence or negligence *per se* to be specified at the time of trial.

11. Each of the foregoing acts or omissions, singularly or in combination with others, constitutes negligence, which was a proximate cause of the collision and Plaintiff's injuries and damages.



Respondeat Superior – Defendant Tyson Foods

12. Defendant Tyson Foods is liable for Defendant Jabarzadeh's negligence under the doctrine of *Respondeat Superior*. Defendant Jabarzadeh was employed by Defendant Tyson Foods at the time of the collision. Further, he was acting in the course and scope of his employment when he negligently operated the vehicle and trailer owned by Defendant Tyson Foods, which caused the crash that makes the basis of this lawsuit.

Negligent Entrustment – Defendants Tyson Foods

13. Defendant Tyson Foods owned the vehicle that Defendant Jabarzadeh was operating at the time of the collision. Defendant Tyson Foods negligently entrusted its vehicle to Defendant Jabarzadeh to utilize within the course of his employment on the day of the Collision. Defendant Jabarzadeh operated the 18-wheeler with the knowledge, consent, and permission of Defendant Tyson Foods. Defendant Tyson Foods knew or should have known that Defendant Jabarzadeh was a reckless and/or incompetent driver on the day of the Collision. Defendant Tyson Foods could have and should have reasonably anticipated entrusting a vehicle to a reckless and/or incompetent driver would result in injury. Defendant Jabarzadeh's negligence proximately caused Plaintiff's injuries.

Negligent Hiring, Training and Supervision – Defendant Tyson Foods

14. Defendant Tyson Foods failed to use the ordinary care of a reasonable entity when hiring, training, retaining, and supervising its employees to operate their vehicles and trailers safely and reasonably.

15. Defendant Tyson Foods knew or should have known that an employee who was a negligent and/or incompetent driver would pose a serious risk to others while carrying out the duties of



employment. Defendant Tyson Foods failed to exercise reasonable and ordinary care to avoid harm to others under circumstances similar to those described herein.

VI.
DAMAGES

16. As a result of the injuries sustained by Plaintiff caused by the collision in which this lawsuit arises from, Plaintiff sues for the following:

- a. Physical pain and suffering the past;
- b. Physical pain and suffering that Plaintiff will experience in the future;
- c. Mental anguish suffered in the past;
- d. Mental anguish Plaintiff will experience in the future;
- e. Medical expenses incurred in the past;
- f. Medical expenses the Plaintiff will incur in the future;
- g. Physical impairment suffered in the past;
- h. Physical impairment the Plaintiff will suffer in the future;
- i. Disfigurement;
- j. Lost wages past and future;
- k. Loss of earning capacity past and future.

17. Defendants' actions caused Plaintiff to suffer and sustain damages within the jurisdictional requirements of this Court and in such an amount as evidence may show proper at the time of trial.

18. Plaintiff sues Defendants for all causes of action pled in this petition jointly and severally, for all damages Defendants caused Plaintiff described in this Petition.

VII.
PREJUDGMENT AND POST JUDGEMENT INTEREST

19. Plaintiff seeks pre-judgement and post judgement interest as allowed by law.



VIII.
COURT COSTS

20. Plaintiff sues to recover court costs as allowed by law.

IX.
DEMAND FOR JURY TRIAL

21. Plaintiff demands jury trial and has tendered the appropriate fee.

X.
INITIAL DISCLOSURES

22. Defendants are required to provide initial disclosures in accordance with *Texas Rule of Civil Procedure 194.2*.

XI.
RULE 193.7 NOTICE

23. Plaintiff intends to use Defendants' discovery responses as evidence at trial in accordance with such right and privileges established by *Texas Rule of Civil Procedure 193.7*.

XII.
PRAYER

24. For these reasons, Plaintiff prays that Defendants be cited to appear and answer herein, and that upon final hearing hereof, Plaintiff has judgment against Defendants for actual damages, prejudgment and post judgment interest, and costs. Plaintiff further prays for such other and further relief, at law or in equity, general or specific, that Plaintiff may be justly entitled.



Respectfully submitted,

By: /s/ Myles Lenz
Ramez F. Shamieh
Louisiana State Bar No. 35558
Texas State Bar No. 24066683
New York State Bar No. 5280219
Myles Lenz
Texas State Bar No. 24092685
myles@shamiehlaw.com

SHAMIEH LAW, PLLC
1111 West Mockingbird Lane, Suite 1160
Dallas, Texas 75247
214.389.7333 telephone
214.389.7335 facsimile
ATTORNEYS FOR PLAINTIFF



CERTIFIED A TRUE AND CORRECT COPY
OF THE RECORD ON FILE IN MY OFFICE

DAVID TRANTHAM
DENTON COUNTY DISTRICT CLERK
1/20/23 By: JMG J. Worth
Deputy Clerk

CITATION –TRC 99 and 106

THE STATE OF TEXAS

COUNTY OF DENTON

CAUSE NO. 22-10862-431

TO: Tyson Foods, Inc. Registered Agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201 (or wherever he/she may be found)

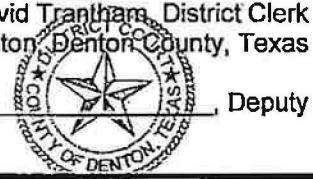
Notice to defendant: You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the first Monday following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may also be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

Court:	431st Judicial District Court 1450 E. McKinney, 4th Floor, Denton, TX 76209
Cause No.:	22-10862-431
Date of Filing:	December 22, 2022
Document:	Plaintiff's Original Petition
Parties in Suit:	Shane Burris; Tyson Foods, Inc.; Amir Ata Jabarzadeh
Clerk:	David Trantham, District Clerk, 1450 E. McKinney, Suite 1200, Denton, TX 76209
Party or Party's Attorney:	Ramez F. Shamieh 1111 West Mockingbird Lane, Suite 1160 Dallas, Texas 75247

Issued under my hand and seal of this said court on this the 22nd day of December, 2022.

David Trantham, District Clerk
Denton, Denton County, Texas

BY: 
Lupa Avelino



Deputy

Service Return

Came to hand on the _____ day of _____, 20____, at _____ m., and executed on the _____ day of _____, 20____, at _____ M by delivering to the within named _____ in person a true copy of this citation, with attached copy(ies) of the Plaintiff's Original Petition, at _____

Service Fee: \$ _____ Sheriff/Constable

County, Texas

Service ID No. _____ Deputy/Authorized Person

VERIFICATION

On this day personally appeared _____ known to me to be the person whose name is subscribed on the foregoing instrument and who has stated: upon penalty of perjury, I attest that the foregoing instrument has been executed by me in this cause pursuant to the Texas Rules of Civil Procedure. I am over the age of eighteen years and I am not a party to or interested in the outcome of this suit, and have been authorized by the Denton County Courts to serve process.

Subscribed and sworn to before me on this the _____ day of _____, 20____

Notary Public

CERTIFIED A TRUE AND CORRECT COPY
OF THE RECORD ON FILE IN MY OFFICE

DAVID TRANTHAM
DENTON COUNTY DISTRICT CLERK
1-20-23 By: 
Date 

Deputy Clerk

CITATION -TRC 99 and 106

THE STATE OF TEXAS

COUNTY OF DENTON

CAUSE NO. 22-10862-431

TO: Tyson Foods, Inc. Registered Agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201 (or wherever he/she may be found)

Notice to defendant: You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the first Monday following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may also be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

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Clerk:	David Trantham, District Clerk, 1450 E. McKinney, Suite 1200, Denton, TX 76209
Party or Party's Attorney:	Ramez F. Shamieh 1111 West Mockingbird Lane, Suite 1160 Dallas, Texas 75247

Issued under my hand and seal of this said court on this the 22nd day of December, 2022.

David Trantham, District Clerk
Denton, Denton County, Texas

AFFIDAVIT

BY: _____ Deputy
Lupe Avelino

ATTACHED Service Return

Came to hand on the _____ day of _____, 20____, at _____ m., and executed on the _____ day of _____, 20____, at _____ M by delivering to the within named _____ in person a true copy of this citation, with attached copy(ies) of the Plaintiff's Original Petition, at _____.

Service Fee: \$ _____ Sheriff/Constable
County, Texas

Service ID No. _____ Deputy/Authorized Person

VERIFICATION

On this day personally appeared _____ known to me to be the person whose name is subscribed on the foregoing instrument and who has stated: upon penalty of perjury, I attest that the foregoing instrument has been executed by me in this cause pursuant to the Texas Rules of Civil Procedure. I am over the age of eighteen years and I am not a party to or interested in the outcome of this suit, and have been authorized by the Denton County Courts to serve process.

Subscribed and sworn to before me on this the _____ day of _____, 20____, Notary Public



AFFIDAVIT OF SERVICE

State of Texas

County of Denton

431st Judicial District Court

Case Number: 22-10862-431

Plaintiff:
Shane Burris

vs.

Defendant:
Tyson Foods, Inc., and Amir Ata Jabarzadeh

For:
Ramez Shamish
1111 W. Mockingbird Ln
Suite 1160
Dallas, TX 75247

Received by Anthony Collins on the 28th day of December, 2022 at 2:11 pm to be served on **Tyson Foods, Inc. r/a CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Dallas County, TX 75201**.

I, Anthony Collins, being duly sworn, depose and say that on the 29th day of December, 2022 at 2:55 pm, I:

Executed service by hand delivering a true copy of the **Citation, Copy of Plaintiff's Original Petition to: George Martinez**, an authorized acceptance agent employed by **Registered Agent CT Corporation System, Inc.**, who is authorized to accept service of process for **Tyson Foods, Inc.**, at the address of: **1999 Bryan Street, Suite 900, Dallas, Dallas County, TX 75201**, and informed said person of the contents therein, in compliance with state statutes.

"I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server in good standing in the judicial circuit in which the process was served. I have personal knowledge of the facts set forth in this affidavit, and they are true and correct."



Subscribed and sworn before me on the 30th day of December, 2022 by the affiant who is personally known to me.


NOTARY PUBLIC



Anthony Collins
PSC-357 Expires 12/31/2023

On Time Process Service
1700 Pacific Ave
Suite 1040
Dallas, TX 75201
(214) 740-9999

Our Job Serial Number: ONT-2022008349
Ref: Shane Burris



Automated Certificate of eService

This automated certificate of service was created by the efilng system. The filer served this document via email generated by the efilng system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 71428661
Status as of 1/4/2023 9:29 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jose Olivares		jose@shamiehlaw.com	1/3/2023 12:07:25 PM	SENT
Myles Lenz		myles@shamiehlaw.com	1/3/2023 12:07:25 PM	SENT



CERTIFIED A TRUE AND CORRECT COPY
OF THE RECORD ON FILE IN MY OFFICE

DAVID TRANTHAM

DENTON COUNTY DISTRICT CLERK

1/20/23
Date

By: *David A. Trantham*
Deputy Clerk

CITATION – TRC 99 and 106

THE STATE OF TEXAS

COUNTY OF DENTON

CAUSE NO. 22-10862-431

TO: Amir Ata Jabarzadeh 11448 Conser Street, Overland Park, Kansas, 66210 (or wherever he/she may be found)

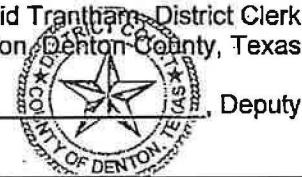
Notice to defendant: You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the first Monday following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may also be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

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Clerk:	David Trantham, District Clerk, 1450 E. McKinney, Suite 1200, Denton, TX 76209
Party or Party's Attorney:	Ramez F. Shamieh 1111 West Mockingbird Lane, Suite 1160 Dallas, Texas 75247

Issued under my hand and seal of this said court on this the 22nd day of December, 2022.

David Trantham, District Clerk
Denton, Denton County, Texas

BY: 
Lupe Avelino

**Service Return**

Came to hand on the _____ day of _____, 20____, at _____ m., and executed on the _____ day of _____, 20____, at _____ M by delivering to the within named _____ in person a true copy of this citation, with attached copy(ies) of the Plaintiff's Original Petition, at _____

Service Fee: \$ _____

Sheriff/Constable
County, Texas

Service ID No. _____

Deputy/Authorized Person

VERIFICATION

On this day personally appeared _____ known to me to be the person whose name is subscribed on the foregoing instrument and who has stated: upon penalty of perjury, I attest that the foregoing instrument has been executed by me in this cause pursuant to the Texas Rules of Civil Procedure. I am over the age of eighteen years and I am not a party to or interested in the outcome of this suit, and have been authorized by the Denton County Courts to serve process.

Subscribed and sworn to before me on this the _____ day of _____, 20____
Notary Public



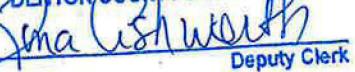
CERTIFIED A TRUE AND CORRECT COPY
OF THE RECORD ON FILE IN MY OFFICE

DAVID TRANTHAM

DENTON COUNTY DISTRICT CLERK

1/20/23
Date

By:



Deputy Clerk